

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE

In re:

KARL C. HANSEN AND LISA H. HANSEN,

Debtors.

Chapter 7

Case No. 12-11907-JMD

Hearing Date: April 12, 2017

Hearing Time: 9:00 a.m.

**AFFIDAVIT OF DUANE H. MATHIOWETZ IN SUPPORT OF**  
**ADMINISTRATIVE MOTION TO FILE UNDER SEAL PORTIONS OF ITS**  
**PRETRIAL MEMORANDUM AND DOCUMENTS DESIGNATED**  
**CONFIDENTIAL**

Pursuant to Fed. R. Bankr. P. 2014(a), I Duane H. Mathiowetz, being duly sworn, do hereby depose and state as follows:

1. I am a shareholder with the law firm LeClairRyan LLP and am attorney of record for Third Party PixArt Imaging, Inc. ("PixArt").

2. I submit this affidavit in support of PixArt's Administrative Motion to File Under Seal Portions of its Pretrial Memorandum in Support of Trustee's Sale of Assets to PixArt Imaging and Documents Designated Confidential. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would competently testify thereto.

3. On PixArt's behalf, I have reviewed and complied with the Bankruptcy Court Rules regarding Administrative Motions to File Under Seal. I have further reviewed and complied with LBR 5005-4 and LBR 5005-5.

4. Certain documents in the related district court litigation have been designated as "Confidential" or "Confidential Attorneys Eyes Only" pursuant to the Protective Order entered in the matter by the Eastern District of Texas. Among those documents are the transcripts of

the deposition testimony of Karl Hansen, debtor in this matter, which was designated as Confidential Attorneys Eyes Only by SyncPoint's counsel, and the Expert Report by Clarke B. Nelson, who is SyncPoint's damages expert in the district court litigation. Mr. Clarke relies on and cites confidential sales information of PixArt, which PixArt desires to keep from public disclosure.

5. Information set forth in the aforementioned documents is deemed necessary to fully apprise this Court of reasons that PixArt asserts that its bid is the highest and best offer for the Patent Assets (as defined in the Sale Motion), and PioxArt's assessment of the likelihood of success and the amount of any likely judgment or settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at San Francisco, CA.

Dated: April 5, 2017

/s/ Duane H. Mathiowetz  
Duane H. Mathiowetz  
LeClairRyan LLP